State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
PORTAGE COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 16-02332

DATE: 5/11/2004

Kent State University
Thomas Dunn
PO Box 5190
Kent, OH 44242

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **ARAQMD**

FINAL PERMIT TO INSTALL 16-02332

Application Number:	16-02332
APS Premise Number:	1667040085
Permit Fee:	**$1800**
Name of Facility:	Kent State University
Person to Contact:	Thomas Dunn
Address:	PO Box 5190 Kent, OH 44242

Location of proposed air contaminant source(s) [emissions unit(s)]:
100 Terrace Dr
Kent, Ohio

Description of proposed emissions unit(s):
76 MMBTU/Hr Natural Gas Fired Combustion Turbine.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
CO	87.0
NOx	99.0
PE	9.5
SO2	99.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-07(B)
		OAC 3745-23-06(B)
B006 (Nebraska Boiler No 6, formerly permitted in PTI 16-02164 as issued final July 2, 2002) 121 million Btu/hr rated heat input natural gas/fuel oil-fired boiler, New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart Db applicable, NEW SOURCE REVIEW (NSR) SYNTHETIC MINOR per PTI 16-02332 using federally enforceable fuel usage limitations to maintain this PSD Source Category No. 24 (fossil fuel boilers, or combination thereof, totaling more than 250 million Btu/hr heat input) project below the 100 TPY major source threshold to avoid PSD review	OAC rule 3745-31-05(A)(3)	40 CFR Part 75
		OAC rule 3745-103
		OAC rule 3745-31-05(C)
	40 CFR 60.42b	
	40 CFR 60.43b	
	40 CFR 60.44b	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-10(B)	
	OAC rule 3745-18-06(D)	
	OAC rule 3745-21-08(B)	

Applicable Emissions Limitations/Control Measures	
	See A.I.2.b below.
20% opacity as a six-minute average 0.020 lb PE/mmBtu heat input 0.55 lb SO2/mmBtu heat input when burning gas: 0.16 lb NOx/mmBtu heat input 0.16 lb CO/mmBtu heat input when burning oil: 0.20 lb NOx/mmBtu heat input 0.18 lb CO/mmBtu heat input The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-31-05(C), and Part III, Section A.II below. The emission control requirements of these rules are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).	See A.I.2.c below. The following annual emission limits, for B006 through B010 combined, are based upon a rolling, 12-month summation of the monthly emissions, and are restricted by the federally enforceable production limitations of Part III, Section A.II: 87.0 tons/year of CO; 99.0 tons/year of NOx; 9.5 tons/year of PE; and 99.0 tons/year of SO2.

2. Additional Terms and Conditions

2.a The mass emission limitations for PE, SO2, NOx, and CO regulated per OAC rule 3745-31-05(A)(3) are equal to or greater than the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits.

However, if any proposed change(s), such as with fuel grade, quality, and/or heat content, heat input capacity, equipment changeover, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.c If the permittee is subject to the requirements of 40 CFR Part 72 and 75 concerning acid rain, the permittee shall ensure that any effected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

II. Operational Restrictions

1. No oil, except No. 2 fuel oil containing no more than 0.48% by weight of sulfur and meeting the distillate oil and very low sulfur oil definitions of 40 CFR 60.41b, shall be burned in this emissions unit.

2. No gas, except natural gas having a heat content of at least 1000 Btu per standard cubic foot and a sulfur content of less than 0.3 pound per million standard cubic foot, shall be burned in this emissions unit.

3. No fuels, other than the oil and gas specified above, shall be burned in this emissions unit.

4. If burned exclusively, with no usage of gas, the maximum annual oil usage for B006 through B008 combined shall not exceed 2.627 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

5. If burned exclusively, with no usage of gas, the maximum annual oil usage for B008 shall not exceed 0.740 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

6. If burned exclusively, with no usage of oil, the maximum annual gas usage for B006 through B010 combined shall not exceed 1414 million cubic feet based upon a rolling, 12-month summation of the monthly gas usage rates.

7. If oil is substituted for gas in B006 and/or B007, then the annual limit of 1414 million cubic feet of gas shall be reduced by 71.5 cubic feet for each gallon of oil burned.

8. If oil is substituted for gas in B008, then the annual limit of 1414 million cubic feet of gas shall be reduced by 540 cubic feet for each gallon of oil burned.

9. The permittee has existing fuel usage records such that there is no need for first year monthly fuel usage limitations.

10. Consequent to the results from initial performance testing conducted on June 12-13, 2001, and pursuant to OAC rule 3745-17-10(B)(3), the heat input for B006, when burning oil, is derated from 121 mmBtu/hr to 72.6 mmBtu/hr. Correspondingly, when burning oil, at no time shall the steam flow rate from B006 exceed 60,000 lbs/hr (as an average over any one-hour period).

    The steam flow rate output restriction of B006 may be removed upon written approval from the Director (the appropriate Ohio EPA District Office or local air agency) and without need of

formal permit modification or issuance of a new permit, provided the permittee retests B006 and demonstrates compliance when burning oil at or near the maximum rated heat input of 121 mmBtu/hr and steam flow rate output of 100,000 lbs/hr, following the requirements of V.3 "Test Requirements" below.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain fuel receipts from the fuel supplier listing the ASTM D396-78 specifications (including fuel oil number and weight percent sulfur content), and certifying that the oil meets the definitions of distillate oil and very low sulfur oil of 40 CFR 60.41b.

2. The permittee shall maintain monthly records of the following information for B006 through B010 combined:

   a. the monthly amount of oil burned (gallons);
   b. the rolling, 12-month summation of the monthly oil burned (gallons);
   c. the monthly amount of gas burned (cubic feet);
   d. the rolling, 12-month summation of the monthly gas burned (cubic feet);
   e. the monthly emissions (tons) for each of CO, NOx, PE, and SO2; and
   f. the rolling, 12-month summation of the monthly emissions (tons) for each of CO, NOx, PE, and SO2.

3. In accordance with 40 CFR Part 60.48b, for the combustion of oil, the permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of particulate emissions from this emissions unit discharged to the atmosphere, and record the output of the system in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

   Prior to the installation of the COMS, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

4. In accordance with 40 CFR Part 60.48b, the permittee shall install, calibrate, maintain, and operate a continuous emission monitoring (CEM) system for measuring nitrogen oxide emissions discharged to the atmosphere and record the output of the system in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

   Prior to the installation of the NOx CEM, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.

5. Span values for nitrogen oxides shall be determined in accordance with 40 CFR 60.48b(e).

6. When nitrogen oxides emission data are not obtained because of CEM system breakdowns, repairs, calibration checks, and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

7. In accordance with 40 CFR 60.49b(g), the permittee shall maintain records of the following information for each steam generating unit operating day:

   a. Calendar date;

   b. The average hourly nitrogen oxides emission rates (lb/million Btu heat input) measured or predicted;

   c. The 30-day average nitrogen oxides emission rates (lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxides emission rates or the preceding 30 steam generating unit operating days;

   d. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards, with the reasons for such excess emissions as well as a description of corrective actions taken;

   e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;

   f. Identification of times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;

   g. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;

   h. Identification of the times when the pollutant concentration exceeded full span of the CEM system;

   i. Description of any modifications to the CEM system that could affect the ability of the system to comply with Performance Specification 2 or 3; and

j. Results of daily CEM systems drift tests.

8. The permittee shall maintain daily records of the volume (cubic feet) and corresponding heat content (Btu per standard cubic foot) and sulfur content (pounds per million standard cubic foot) of natural gas burned in this emissions unit.

9. The permittee shall continuously monitor and record the steam flow rate from B006. Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be made available to the Director (appropriate Ohio EPA District Office or local air agency) upon verbal or written request.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports certifying no fuel, except as specified above in Part III, A.II Operational Restrictions, was burned in this emissions unit during the preceding calendar quarter.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly fuel usages, each for oil and gas, as specified in Part III, A.II Operational Restrictions, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation of the monthly emissions, each for CO, NOx, PE, and SO2, for B006 through B010 combined, as well as the corrective actions that were taken to achieve compliance.

4. The permittee shall submit notification of the date of initial startup, as provided by 40 CFR60.7. The notification shall include the design heat input capacity of the steam generating unit(s) and identification of the fuels to be combusted in the subject units.

5. The permittee shall submit to the Administrator the performance test data from the initial emissions test and the performance evaluation of the continuous monitoring systems using the applicable performance specifications in 40 CFR Part 60, Appendix B.

6. Within 180 days of the effective date of this permit, if not already done so, the permittee shall develop a written quality assurance/quality control plan for the COMS designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks and a description of preventive maintenance activities. The quality assurance/quality control plan and a logbook dedicated to the COMS must be kept on site and available for inspection during regular office hours.

7. Within 180 days of the effective date of this permit, if not already done so, the permittee shall develop a written quality assurance/quality control plan for the NOx CEMS designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks and a description of preventive maintenance activities. The quality assurance/quality control plan and a logbook dedicated to the NOx CEMS must be kept on site and available for inspection during regular office hours.

8. The permittee shall submit a quarterly report containing the information recorded under 40 CFR 60.49b(g).

9. If for any reason the steam flow rate from B006 exceeds 60,000 lbs/hr, when burning oil, the following information shall be reported within 5 business days after the exceedance:

   a. the date of the exceedance;

   b. the time interval over which the exceedance occurred;

   c. the value of the exceedance;

   d. the cause(s) of the exceedance;

   e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and

   f. a copy of the steam chart which shows the exceedance.

10. Unless specified otherwise, all above reports shall be submitted in accordance with the deadlines and other requirements specified in Part I - General Term and Condition 2 of this permit.

11. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times, if not already done so:

   a. Construction date (no later than 30 days after such date);

   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

   c. Actual start-up date (within 15 days after such date); and

   d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Akron Regional Air Quality Management District (ARAQMD)
146 S High Street -- Room 904
Akron, OH 44308

V. Testing Requirements

1. Compliance with the emission limitations of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the following methods, using applicable emission factors from US EPA reference document AP-42, Fifth

Edition, Tables 1.3-1, 1.4-1, and 1.4-2, and heat contents of 137,000 Btu/gallon of oil & 1000 Btu/cubic foot of gas:

a. Emission Limitation: 20% opacity as a six-minute average

Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

b. Emission Limitation: 0.020 lb PE/mmBtu heat input

Applicable Compliance Method: The potential to emit is less than the above emission limitation, as demonstrated in the equations below:

when burning gas:

E = GP/H

where,

E = 0.0019 lb PE/mmBtu heat input [potential to emit];
G = 0.121 mm cu ft/hr [design fuel usage];
P = 1.9 lbs PE/mm cu ft [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

when burning oil:

E = OP/H

where,

E = 0.01 lb PE/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
P = 2 lbs PE/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 5.

c. Emission Limitation: 0.55 lb SO2/mmBtu heat input

Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated in the equation below:

when burning gas:
Compliance with this limitation will be assumed due to the negligible % sulfur content of natural gas.

when burning oil:

E = OS/H

where,

E = 0.55 lb SO2/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
S = 75.36 lbs SO2/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 6.

d. Emission Limitations: 0.16 lb NOx/mmBtu heat input (when burning gas); and 0.20 lb NOx/mmBtu heat input (when burning oil)

Applicable Compliance Method: The potential to emit is less than the above emission

limitations, as demonstrated in the equations below:

when burning gas:

E = GN/H

where,

E = 0.14 lb NOx/mmBtu heat input [potential to emit];
G = 0.121 mm cu ft/hr [design fuel usage];
N = 140 lbs NOx/mm cu ft [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

when burning oil:

E = ON/H

where,

E = 0.073 lb NOx/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
N = 10 lbs NOx/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 7E.

e. Emission Limitation: 0.16 lb CO/mmBtu heat input (when burning gas); and 0.18 lb CO/mmBtu heat input (when burning oil)

Applicable Compliance Method: The potential to emit is less than the above emission limitations, as demonstrated in the equations below:

when burning gas:

E = GC/H

where,

E = 0.084 lb CO/mmBtu heat input [potential to emit];

G = 0.121 mm cu ft/hr [design fuel usage];
C = 84 lbs CO/mm cu ft [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

when burning oil:

E = OC/H

where,

E = 0.04 lb CO/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
C = 5 lbs CO/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 10.

2. Compliance with the annual CO, NOx, PE, and SO2 emission limitations of OAC rule 3745-31-05 (C) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the emissions determination, as required in the record keeping section of Part III, Section A.III.2 above, using the synthetic minor potential to emit strategy contained in the "Permit to Install Application Supporting Documentation" prepared 10/21/03 by David Marczely, Environmental Design Group, 450 Grant Street, Akron, Ohio 44311, included in the application.

3. The permittee shall have the option to remove the deration and corresponding steam flow rate output restriction of Part III, Section A.II.10 above by conducting emission testing of this emissions unit, when burning oil, in accordance with the following requirements:

   a. The emission testing shall be conducted to demonstrate compliance with the visible particulate emissions limitation (% opacity) and the NOx mass emissions limitation (lbs NOx/mmBtu heat input), when burning oil.

   b. The tests shall demonstrate compliance with the following allowable emission rates using the specified test methods:

      20% opacity as a six-minute average, using Method 9 of 40 CFR Part 60, Appendix A; and

      0.20 lb NOx/mmBtu heat input, using Method 7E of 40 CFR Part 60, Appendix A.

      Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall conduct, or have conducted, performance testing of the COMS in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1 and ASTM D 6216-98, following the manufacturer's specified quality assurance procedures. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Copies of the test results shall be submitted to Ohio EPA Central Office and Akron Air Quality.

5. The permittee demonstrated compliance with the NOx and opacity emission standards of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 at or near design capacity, while burning gas, and at 60% of design capacity, while burning oil, and successfully completed certification of the NOx CEM system, in accordance with 40 CFR 60.8, 40 CFR 60.46b, and 40 CFR 60, Appendix B, Performance Specifications 2 & 3, during the emissions and performance testing conducted on June 12-13, 2001. A final test report was received at this office on July 23, 2001.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

3. Permit to Install (PTI) 16-02332 supersedes all of the requirements of PTI 16-02164, as issued July 2, 2002, for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B006 - Nebraska Boiler No 6	OAC rule 3745-31-05	None (All applicable permit requirements are contained in Part III.A "State and Federally Enforceable Section" of this Permit to Install.)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
B007 (Nebraska Boiler No 7, formerly permitted in PTI 16-02164 as issued final July 2, 2002) 121 million Btu/hr rated heat input natural gas/fuel oil-fired boiler, New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart Db applicable, NEW SOURCE REVIEW (NSR) SYNTHETIC MINOR per PTI 16-02332 using federally enforceable fuel usage limitations to maintain this PSD Source Category No. 24 (fossil fuel boilers, or combination thereof, totaling more than 250 million Btu/hr heat input) project below the 100 TPY major source threshold to avoid PSD review	OAC rule 3745-31-05(A)(3) 40 CFR 60.42b 40 CFR 60.43b 40 CFR 60.44b OAC rule 3745-17-07(A) OAC rule 3745-17-10(B) OAC rule 3745-18-06(D) OAC rule 3745-21-08(B) OAC rule 3745-21-07(B) OAC 3745-23-06(B) 40 CFR Part 75 OAC rule 3745-103 OAC rule 3745-31-05(C)

Applicable Emissions Limitations/Control Measures	
	See Part III, Section A.I.2.c below.
20% opacity as a six-minute average 0.020 lb PE/mmBtu heat input 0.55 lb SO2/mmBtu heat input when burning gas: 0.16 lb NOx/mmBtu heat input 0.16 lb CO/mmBtu heat input when burning oil: 0.20 lb NOx/mmBtu heat input 0.18 lb CO/mmBtu heat input	The following annual emission limits, for B006 through B010 combined, are based upon a rolling, 12-month summation of the monthly emissions, and are restricted by the federally enforceable production limitations of Part III, Section A.II: 87.0 tons/year of CO; 99.0 tons/year of NOx; 9.5 tons/year of PE; and 99.0 tons/year of SO2.
The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-31-05(C), and Part III, Section A.II below. The emission control requirements of these rules are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).	
See Part III, Section A.I.2.b.	

2. Additional Terms and Conditions

2.a The mass emission limitations for PE, SO2, NOx, and CO regulated per OAC rule 3745-31-05(A)(3) are equal to or greater than the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits.

However, if any proposed change(s), such as with fuel grade, quality, and/or heat content, heat input capacity, equipment changeover, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.c If the permittee is subject to the requirements of 40 CFR Part 72 and 75 concerning acid rain, the permittee shall ensure that any effected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

II. Operational Restrictions

1. No oil, except No. 2 fuel oil containing no more than 0.48% by weight of sulfur and meeting the distillate oil and very low sulfur oil definitions of 40 CFR 60.41b, shall be burned in this emissions unit.

2. No gas, except natural gas having a heat content of at least 1000 Btu per standard cubic foot and a sulfur content of less than 0.3 pound per million standard cubic foot, shall be burned in this emissions unit.

3. No fuels, other than the oil and gas specified above, shall be burned in this emissions unit.

4. If burned exclusively, with no usage of gas, the maximum annual oil usage for B006 through B008 combined shall not exceed 2.627 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

5. If burned exclusively, with no usage of gas, the maximum annual oil usage for B008 shall not exceed 0.740 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

6. If burned exclusively, with no usage of oil, the maximum annual gas usage for B006 through B010 combined shall not exceed 1414 million cubic feet based upon a rolling, 12-month summation of the monthly gas usage rates.

7. If oil is substituted for gas in B006 and/or B007, then the annual limit of 1414 million cubic feet of gas shall be reduced by 71.5 cubic feet for each gallon of oil burned.

8. If oil is substituted for gas in B008, then the annual limit of 1414 million cubic feet of gas shall be reduced by 540 cubic feet for each gallon of oil burned.

9. The permittee has existing fuel usage records such that there is no need for first year monthly fuel usage limitations.

10. Consequent to the results from emission compliance testing conducted on June 13, 2002, and pursuant to OAC rule 3745-17-10(B)(3), the heat input for B007, when burning oil, is derated from 121 mmBtu/hr to 84.7 mmBtu/hr. Correspondingly, when burning oil, at no time shall the steam flow rate from B007 exceed 70,000 lbs/hr (as an average over any one-hour period).

    The steam flow rate output restriction of B007 may be removed, upon written approval from the Director (the appropriate Ohio EPA District Office or local air agency), without the need of

formal permit modification or issuance of a new permit, provided the permittee retests B007 and demonstrates compliance when burning oil at or near the maximum rated heat input of 121 mmBtu/hr and steam flow rate output of 100,000 lbs/hr, following the requirements of V.3 "Test Requirements" below.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain fuel receipts from the fuel supplier listing the ASTM D396-78 specifications (including fuel oil number and weight percent sulfur content), and certifying that the oil meets the definitions of distillate oil and very low sulfur oil of 40 CFR 60.41b.

2. The permittee shall maintain monthly records of the following information for B006 through B010 combined:

   a. the monthly amount of oil burned (gallons);
   b. the rolling, 12-month summation of the monthly oil burned (gallons);
   c. the monthly amount of gas burned (cubic feet);
   d. the rolling, 12-month summation of the monthly gas burned (cubic feet);
   e. the monthly emissions (tons) for each of CO, NOx, PE, and SO2; and
   f. the rolling, 12-month summation of the monthly emissions (tons) for each of CO, NOx, PE, and SO2.

3. In accordance with 40 CFR Part 60.48b, for the combustion of oil, the permittee shall install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of particulate emissions from this emissions unit discharged to the atmosphere, and record the output of the system in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

   Prior to the installation of the COMS, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

4. In accordance with 40 CFR Part 60.48b, the permittee shall install, calibrate, maintain, and operate a continuous emission monitoring (CEM) system for measuring nitrogen oxide emissions discharged to the atmosphere and record the output of the system in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

   Prior to the installation of the NOx CEM, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.

5. Span values for nitrogen oxides shall be determined in accordance with 40 CFR 60.48b(e).

6. When nitrogen oxides emission data are not obtained because of CEM system breakdowns, repairs, calibration checks, and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

7. In accordance with 40 CFR 60.49b(g), the permittee shall maintain records of the following information for each steam generating unit operating day:

   a. Calendar date;

   b. The average hourly nitrogen oxides emission rates (lb/million Btu heat input) measured or predicted;

   c. The 30-day average nitrogen oxides emission rates (lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxides emission rates or the preceding 30 steam generating unit operating days;

   d. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards, with the reasons for such excess emissions as well as a description of corrective actions taken;

   e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;

   f. Identification of times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;

   g. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;

   h. Identification of the times when the pollutant concentration exceeded full span of the CEM system;

   i. Description of any modifications to the CEM system that could affect the ability of the system to comply with Performance Specification 2 or 3; and

j. Results of daily CEM systems drift tests.

8. The permittee shall maintain daily records of the volume (cubic feet) and corresponding heat content (Btu per standard cubic foot) and sulfur content (pounds per million standard cubic foot) of natural gas burned in this emissions unit.

9. The permittee shall continuously monitor and record the steam flow rate from B007. Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be made available to the Director (appropriate Ohio EPA District Office or local air agency) upon verbal or written request.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports certifying no fuel, except as specified above in Part III, A.II Operational Restrictions, was burned in this emissions unit during the preceding calendar quarter.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly fuel usages, each for oil and gas, as specified in Part III, A.II Operational Restrictions, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month summation of the monthly emissions, each for CO, NOx, PE, and SO2, for B006 through B010 combined, as well as the corrective actions that were taken to achieve compliance.

4. The permittee shall submit notification of the date of initial startup, as provided by 40 CFR60.7. The notification shall include the design heat input capacity of the steam generating unit(s) and identification of the fuels to be combusted in the subject units.

5. The permittee shall submit to the Administrator the performance test data from the initial emissions test and the performance evaluation of the continuous monitoring systems using the applicable performance specifications in 40 CFR Part 60, Appendix B.

6. Within 180 days of the effective date of this permit, if not already done so, the permittee shall develop a written quality assurance/quality control plan for the COMS designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks and a description of preventive maintenance activities. The quality assurance/quality control plan and a logbook dedicated to the COMS must be kept on site and available for inspection during regular office hours.

7. Within 180 days of the effective date of this permit, if not already done so, the permittee shall develop a written quality assurance/quality control plan for the NOx CEMS designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks and a description of preventive maintenance activities. The quality assurance/quality control plan and a logbook dedicated to the NOx CEMS must be kept on site and available for inspection during regular office hours.

8. The permittee shall submit a quarterly report containing the information recorded under 40 CFR 60.49b(g).

9. If for any reason the steam flow rate from B007 exceeds 70,000 lbs/hr, when burning oil, the following information shall be reported within 5 business days after the exceedance:

   a. the date of the exceedance;

   b. the time interval over which the exceedance occurred;

   c. the value of the exceedance;

   d. the cause(s) of the exceedance;

   e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and

   f. a copy of the steam chart which shows the exceedance.

10. All above reports shall be submitted in accordance with the deadlines and other requirements specified in Part I - General Term and Condition 2 of this permit.

11. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times, if not already done so:

   a. Construction date (no later than 30 days after such date);

   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

   c. Actual start-up date (within 15 days after such date); and

   d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Akron Regional Air Quality Management District (ARAQMD)
146 S High Street -- Room 904
Akron, OH 44308

V. Testing Requirements

1. Compliance with the emission limitations of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the following methods, using applicable emission factors from US EPA reference document AP-42, Fifth Edition, Tables 1.3-1, 1.4-1, and 1.4-2, and heat contents of 137,000 Btu/gallon of oil & 1000 Btu/cubic foot of gas:

   a. Emission Limitation: 20% opacity as a six-minute average

      Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

   b. Emission Limitation: 0.020 lb PE/mmBtu heat input

      Applicable Compliance Method: The potential to emit is less than the above emission limitation, as demonstrated in the equations below:

      when burning gas:

      E = GP/H

      where,

      E = 0.0019 lb PE/mmBtu heat input [potential to emit];
      G = 0.121 mm cu ft/hr [design fuel usage];
      P = 1.9 lbs PE/mm cu ft [emission factor]; and
      H = 121 mmBtu/hr [design heat input capacity].

      when burning oil:

      E = OP/H

where,

E = 0.01 lb PE/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
P = 2 lbs PE/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 5.

c. Emission Limitation: 0.55 lb SO2/mmBtu heat input

Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated in the equation below:

when burning gas:

Compliance with this limitation will be assumed due to the negligible % sulfur content of natural gas.

when burning oil:

E = OS/H

where,

E = 0.55 lb SO2/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
S = 75.36 lbs SO2/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 6.

d. Emission Limitations: 0.16 lb NOx/mmBtu heat input (when burning gas); and 0.20 lb NOx/mmBtu heat input (when burning oil)

Applicable Compliance Method: The potential to emit is less than the above emission limitations, as demonstrated in the equations below:

when burning gas:

E = GN/H

where,

E = 0.14 lb NOx/mmBtu heat input [potential to emit];
G = 0.121 mm cu ft/hr [design fuel usage];
N = 140 lbs NOx/mm cu ft [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

when burning oil:

E = ON/H

where,

E = 0.073 lb NOx/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
N = 10 lbs NOx/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 7E.

e. Emission Limitation: 0.16 lb CO/mmBtu heat input (when burning gas); and 0.18 lb CO/mmBtu heat input (when burning oil)

Applicable Compliance Method: The potential to emit is less than the above emission limitations, as demonstrated in the equations below:

when burning gas:

E = GC/H

where,

E = 0.084 lb CO/mmBtu heat input [potential to emit];
G = 0.121 mm cu ft/hr [design fuel usage];

C = 84 lbs CO/mm cu ft [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

when burning oil:

E = OC/H

where,

E = 0.04 lb CO/mmBtu heat input [potential to emit];
O = 883 gals/hr [design fuel usage];
C = 5 lbs CO/1000 gals [emission factor]; and
H = 121 mmBtu/hr [design heat input capacity].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 10.

2. Compliance with the annual CO, NOx, PE, and SO2 emission limitations of OAC rule 3745-31-05 (C) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the emissions determination, as required in the record keeping section of Part III, Section A.III.2 above, using the synthetic minor potential to emit strategy contained in the "Permit to Install Application Supporting Documentation" prepared 10/21/03 by David Marczely, Environmental Design Group, 450 Grant Street, Akron, Ohio 44311, included in the application.

3. The permittee shall have the option to remove the deration and corresponding steam flow rate output restriction of Part III, Section A.II.10 above by conducting emission testing of this emissions unit, when burning oil, in accordance with the following requirements:

   a. The emission testing shall be conducted to demonstrate compliance with the visible particulate emissions limitation (% opacity) and the NOx mass emissions limitation (lbs NOx/mmBtu heat input), when burning oil.

   b. The tests shall demonstrate compliance with the following allowable emission rates using the specified test methods:

      20% opacity as a six-minute average, using Method 9 of 40 CFR Part 60, Appendix A; and

      0.20 lb NOx/mmBtu heat input, using Method 7E of 40 CFR Part 60, Appendix A.

      Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

   c. The tests shall be conducted while the emissions unit is operating at or near its maximum

capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall conduct, or have conducted, performance testing of the COMS in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1 and ASTM D 6216-98, following the manufacturer's specified quality assurance procedures. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified prior to initiation of

the applicable tests and shall be permitted to examine equipment and witness the certification tests. Copies of the test results shall be submitted to Ohio EPA Central Office and Akron Air Quality.

5. The permittee demonstrated compliance with the NOx emission standards of OAC rule 3745-31-05 (A)(3) in Part III, Section A.I.1 at or near design capacity, while burning gas, and successfully completed certification of the NOx CEM system, in accordance with 40 CFR 60.8, 40 CFR 60.46b, and 40 CFR 60, Appendix B, Performance Specifications 2 & 3, during the emissions and performance testing conducted on December 12, 2001. A final test report was received at this office on January 14, 2002.

   The permittee demonstrated compliance with the NOx and opacity emission standards of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 at 70% of design capacity, while burning oil, during the emissions testing conducted on June 13, 2002. A final test report was received at this office on July 15, 2002.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

3. Permit to Install (PTI) 16-02332 supersedes all of the requirements of PTI 16-02164, as issued July 2, 2002, for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B007 - Nebraska Boiler No 7	OAC rule 3745-31-05	None (All applicable permit requirements are contained in Part III.A "State and Federally Enforceable Section" of this Permit to Install.)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	TPY major source threshold to avoid PSD review	Applicable Rules/Requirements
B008 (Combustion Turbine CT-1, formerly permitted in PTI 16-02164 as issued final July 2, 2002) 64.18 mmBtu/hr rated heat input natural gas/fuel oil-fired cogeneration gas turbine driving a 5 MW rated power output electrical generator and a heat recovery steam generator, New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart GG applicable, NEW SOURCE REVIEW (NSR) SYNTHETIC MINOR per PTI 16-02332 using federally enforceable fuel usage limitations to maintain this PSD Source Category No. 24 (fossil fuel boilers, or combination thereof, totaling more than 250 million Btu/hr heat input) project below the 100		OAC rule 3745-31-05(A)(3) OAC rule 3745-18-06(F) 40 CFR 60.332 40 CFR 60.333 OAC rule 3745-17-07(A)

OAC rule 3745-17-11(B)(4)	Applicable Emissions Limitations/Control Measures	12-month summation of the monthly emissions, and are restricted by the federally enforceable production limitations of Part III, Section A.II: 87.0 tons/year of CO; 99.0 tons/year of NOx; 9.5 tons/year of PE; and 99.0 tons/year of SO2.
OAC rule 3745-21-08(B)	20% opacity as a six-minute average	
OAC rule 3745-21-07(B)	0.014 lb PE/mmBtu heat input	
OAC 3745-23-06(B)	0.13 lb CO/mmBtu heat input	
40 CFR Part 75	when burning gas: 0.10 lb NOx/mmBtu heat input (25 ppmvd, mathematically adjusted to 15% oxygen as a diluent)	
OAC rule 3745-103		
OAC rule 3745-31-05(C)	when burning oil: 0.40 lb NOx/mmBtu heat input (98 ppmvd, mathematically adjusted to 15% oxygen as a diluent)	
	The requirements of OAC rule 3745-31-05 (A)(3) also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-18-06(F), and Part III, Section A.II below.	
	0.5 lb SO2/mmBtu heat input	
	The emissions control requirements of these rules are less stringent than the emissions control requirements established pursuant to OAC rule 3745-31-05(A)(3).	
	Part III, Section A.I.2.b.	
	Part III, Section A.I.2.c.	
	The following annual emissions limits, for B006 through B010 combined, are based upon a rolling,	

2. Additional Terms and Conditions

2.a The mass emissions limitations for PE, CO, and NOx regulated per OAC rule 3745-31-05(A)(3) are equal to or greater than the potential to emit for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.

However, if any proposed change(s), such as with fuel grade, quality, and/or heat content, heat input capacity, equipment changeover, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.c If the permittee is subject to the requirements of 40 CFR Part 72 and 75 concerning acid rain, the permittee shall ensure that any effected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

II. Operational Restrictions

1. No oil, except No. 2 fuel oil with a heat content of at least 137,000 Btu/gal, and containing no more than 0.48% by weight sulfur and 3% by weight nitrogen, shall be burned in this emissions unit.

2. No gas, except natural gas with a heat content of at least 1000 Btu per standard cubic foot, a sulfur content of less than 0.3 pound per million standard cubic foot (i.e., 0.0007% by weight sulfur), and 3% by weight nitrogen shall be burned in this emissions unit.

3. No fuels, other than the oil and gas specified above, shall be burned in this emissions unit.

4. If burned exclusively, with no usage of gas, the maximum annual oil usage for B006 through B008 combined shall not exceed 2.627 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

5. If burned exclusively, with no usage of gas, the maximum annual oil usage for B008 shall not exceed 0.740 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

6. If burned exclusively, with no usage of oil, the maximum annual gas usage for B006 through B010 combined shall not exceed 1414 million cubic feet based upon a rolling, 12-month summation of the monthly gas usage rates.

7. If oil is substituted for gas in B006 and/or B007, then the annual limit of 1414 million cubic feet of gas shall be reduced by 71.5 cubic feet for each gallon of oil burned.

8. If oil is substituted for gas in B008, then the annual limit of 1414 million cubic feet of gas shall be reduced by 540 cubic feet for each gallon of oil burned.

9. The permittee has existing fuel usage records such that there is no need for first year monthly fuel usage limitations.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor the volume (i.e., the respective gallons of oil or cubic feet of gas), and associated % by weight sulfur, % by weight nitrogen, Btu/gal of oil, and Btu/cubic foot of gas of the fuel(s) burned in the turbine. The frequency of determination of these values shall be as follows:

   a. If the turbine is supplied fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

   b. If the turbine is supplied fuel without intermediate bulk storage, the values shall be determined and recorded daily. The permittee or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the administrator before they can be used to comply with this section.

2. The permittee shall maintain monthly records of the following information for B006 through B010 combined:

   a. the monthly amount of oil burned (gallons);
   b. the rolling, 12-month summation of the monthly oil burned (gallons);
   c. the monthly amount of gas burned (cubic feet);
   d. the rolling, 12-month summation of the monthly gas burned (cubic feet);
   e. the monthly emissions (tons) for each of CO, NOx, PE, and SO2; and
   f. the rolling, 12-month summation of the monthly emissions (tons) for each of CO, NOx, PE, and SO2.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports certifying no fuel, except as specified above, was burned in this emissions unit during the preceding calendar quarter.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly fuel usages, each for oil and gas, as specified in Part III, A.II Operational Restrictions, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly emissions, each for CO, NOx, PE, and SO2, for B006 through B010 combined, as well as the corrective actions that were taken to achieve compliance.

4. All above reports shall be submitted in accordance with the deadlines and other requirements specified in Part I - General Term and Condition 2 of this permit.

5. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times, if not already done so:

   a. Construction date (no later than 30 days after such date);

   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

   c. Actual start-up date (within 15 days after such date); and

   d. Date of performance testing (if required, at least 30 days prior to testing).

   Reports are to be sent to:

   Ohio Environmental Protection Agency
   DAPC - Permit Management Unit
   P. O. Box 163669
   Columbus, Ohio 43216-3669

   and

   Akron Regional Air Quality Management District (ARAQMD)
   146 S High Street -- Room 904
   Akron, OH 44308

V. Testing Requirements

1. Compliance with the emission limitations of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the following methods, assuming heat contents of 137,000 Btu/gallon of oil & 1000 Btu/cubic foot of gas:

   a. Emission Limitation: 20% opacity as a six-minute average

      Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

   b. Emission Limitation: 0.014 lb PE/mmBtu heat input

      Applicable Compliance Method: The potential to emit is equal to the above emissions limitation, as demonstrated below:

E = 0.014 lb PE/mmBtu heat input [potential emissions per AP-42, 9/98, Table 3.1-1].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 5.

c. Emission Limitation: 0.5 lb SO2/mmBtu heat input

Applicable Compliance Method: The potential to emit is less than the above emission limitation, as demonstrated below:

E = 0.48 lb SO2/mmBtu heat input [AP-42, 4/00, Table 3.1-2a, distillate oil-fired].

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 6.

d. Emission Limitations: 0.10 lb NOx/mmBtu heat input (natural gas); & 0.40 lb NOx/mmBtu heat input (No. 2 fuel oil)

Applicable Compliance Method: The potential to emit is equal to the above emission limitations, as demonstrated below:

E = 0.10 lb NOx/mmBtu heat input [manufacturer's specifications, natural gas-fired]; &
E = 0.40 lb NOx/mmBtu heat input [manufacturer's specifications, distillate oil-fired];

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 7E.

e. Emission Limitation: 0.13 lb CO/mmBtu heat input

Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated below:

E = 0.13 lb CO/mmBtu heat input [manufacturer's specifications, distillate oil-fired];

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 10.

[Note: Burning No.2 fuel (distillate) oil represents the worst-case potential emissions of PE, SO2, NOx, and CO from this emissions unit.]

2. Compliance with the fuel sulfur content and nitrogen content restrictions of this permit shall be determined by any qualified person as follows:

a. sulfur content: ASTM D 2880-71 shall be used for liquid fuels, and ASTM D 1072-80, D

3031-81, D 4084-82, or D 3246-81 shall be used for gaseous fuels. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

b. nitrogen content: analytical methods and procedures shall be used for the fuel burned that are accurate to within 5% and are approved by the Administrator.

3. Compliance with the annual CO, NOx, PE, and SO2 emission limitations of OAC rule 3745-31-05 (C) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the emissions determination, as required in the record keeping section of Part III, Section A.III.2 above, using the synthetic minor potential to emit strategy contained in the "Permit to Install Application Supporting Documentation" prepared 10/21/03 by David Marczely, Environmental Design Group, 450 Grant Street, Akron, Ohio 44311, included in the application.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

3. Permit to Install (PTI) 16-02332 supersedes all of the requirements of PTI 16-02164, as issued July 2, 2002, for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B008 - Combustion Turbine CT 1	OAC rule 3745-31-05	None (All applicable permit requirements are contained in Part III.A "State and Federally Enforceable Section" of this Permit to Install.)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-31-05(C)
B009 (Duct Burner, formerly permitted in PTI 16-02164 as issued final July 2, 2002) 76.2 mmBtu/hr natural gas-fired duct burner providing supplemental heat to a heat recovery steam generator, New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart Dc applicable, NEW SOURCE REVIEW (NSR) SYNTHETIC MINOR per PTI 16-02332 using federally enforceable fuel usage limitations to maintain this PSD Source Category No. 24 (fossil fuel boilers, or combination thereof, totaling more than 250 million Btu/hr heat input) project below the 100 TPY major source threshold to avoid PSD review	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-07(A) OAC rule 3745-17-10(B) OAC rule 3745-18-06(A) OAC rule 3745-21-08(B) OAC rule 3745-21-07(B) OAC 3745-23-06(B)	40 CFR Part 60, Subpart Dc

Applicable Emissions Limitations/Control Measures	
20% opacity as a six-minute average 0.010 lb PE/mmBtu heat input 0.10 lb NOx/mmBtu heat input 0.080 lb CO/mmBtu heat input	The following annual emissions limits, for B006 through B010 combined, are based upon a rolling, 12-month summation of the monthly emissions, and are restricted by the federally enforceable production limitations of Part III, Section A.II: 87.0 tons/year of CO; 99.0 tons/year of NOx; 9.5 tons/year of PE; and 99.0 tons/year of SO2.
No fuel, except natural gas having a heat content of at least 1000 Btu per standard cubic foot and a sulfur content of less than 0.3 pound per million standard cubic foot, shall be burned in this emissions unit.	Exempt from the emission standards of this rule since only natural gas is burned.
The requirements of OAC rule 3745-31-05 (A)(3) also include compliance with the requirements of OAC rule 3745-31-05(C), and Part III, Section A.II below.	
The emission control requirements of these rules are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).	
See Part III, Section A.I.2.b below.	

2. Additional Terms and Conditions

2.a The mass emission limitations for PE, NOx, and CO regulated per OAC rule 3745-31-05 (A)(3) are equal to the potential to emit for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emission limits.

However, if any proposed change(s), such as with fuel grade, quality, and/or heat content, heat input capacity, equipment changeover, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. If burned exclusively, with no usage of gas, the maximum annual oil usage for B006 through B008 combined shall not exceed 2.627 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

2. If burned exclusively, with no usage of gas, the maximum annual oil usage for B008 shall not exceed 0.740 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

3. If burned exclusively, with no usage of oil, the maximum annual gas usage for B006 through B010 combined shall not exceed 1414 million cubic feet based upon a rolling, 12-month summation of the monthly gas usage rates.

4. If oil is substituted for gas in B006 and/or B007, then the annual limit of 1414 million cubic feet of gas shall be reduced by 71.5 cubic feet for each gallon of oil burned.

5. If oil is substituted for gas in B008, then the annual limit of 1414 million cubic feet of gas shall be reduced by 540 cubic feet for each gallon of oil burned.

6. The permittee has existing fuel usage records such that there is no need for first year monthly fuel usage limitations.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the volume (cubic feet) and corresponding heat content (Btu per standard cubic foot) and sulfur content (pounds per million standard cubic foot) of natural gas burned in this emissions unit.

2. The permittee shall maintain monthly records of the following information for B006 through B010 combined:

   a. the monthly amount of oil burned (gallons);
   b. the rolling, 12-month summation of the monthly oil burned (gallons);
   c. the monthly amount of gas burned (cubic feet);
   d. the rolling, 12-month summation of the monthly gas burned (cubic feet);
   e. the monthly emissions (tons) for each of CO, NOx, PE, and SO2; and
   f. the rolling, 12-month summation of the monthly emissions (tons) for each of CO, NOx, PE, and SO2.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports certifying no fuel, except as specified above in Part III, A.I Applicable Emissions Limitations/Control Measures, was burned in this emissions unit during the preceding calendar quarter.

2. In accordance with 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by paragraph 60.7 of this part. The notification shall include the design heat input capacity of this steam generating unit and identification of the fuels to be combusted in the subject unit.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly fuel usages, each for oil and gas, as specified in Part III, A.II Operational Restrictions, as well as the corrective actions that were taken to achieve compliance.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly emissions, each for CO, NOx, PE, and SO2, for B006 through B010 combined, as well as the corrective actions that were taken to

achieve compliance.

5. All above reports shall be submitted in accordance with the deadlines and other requirements specified in Part I - General Term and Condition 2 of this permit.

6. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times, if not already done so:

   a. Construction date (no later than 30 days after such date);

   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

   c. Actual start-up date (within 15 days after such date); and

   d. Date of performance testing (if required, at least 30 days prior to testing).

   Reports are to be sent to:

   Ohio Environmental Protection Agency
   DAPC - Permit Management Unit
   P. O. Box 163669
   Columbus, Ohio 43216-3669

   and

   Akron Regional Air Quality Management District (ARAQMD)
   146 S High Street -- Room 904
   Akron, OH 44308

V. Testing Requirements

1. Compliance with the emission limitations of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the following methods, assuming a heat content of 1000 Btu/cubic foot of gas:

   a. Emission Limitation: 20% opacity as a six-minute average

      Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

   b. Emission Limitation: 0.010 lb PE/mmBtu heat input

      Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated below:

      E = 0.010 lb PE/mmBtu heat input [manufacturer's potential to emit test data];

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 5.

c. Emission Limitations: 0.10 lb NOx/mmBtu heat input

Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated below:

E = 0.10 lb NOx/mmBtu heat input [manufacturer's potential to emit test data];

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 7E.

d. Emission Limitation: 0.080 lb CO/mmBtu heat input

Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated below:

E = 0.080 lb CO/mmBtu heat input [manufacturer's potential to emit test data];

Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 10.

2. Compliance with the annual CO, NOx, PE, and SO2 emission limitations of OAC rule 3745-31-05 (C) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the emissions determination, as required in the record keeping section of Part III, Section A.III.2 above, using the synthetic minor potential to emit strategy contained in the "Permit to Install Application Supporting Documentation" prepared 10/21/03 by David Marczely, Environmental Design Group, 450 Grant Street, Akron, Ohio 44311, included in the application.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

3. Permit to Install (PTI) 16-02332 supersedes all of the requirements of PTI 16-02164, as issued July 2, 2002, for this emissions unit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B009 - Duct Burner	OAC rule 3745-31-05	None (All applicable permit requirements are contained in Part III.A "State and Federally Enforceable Section" of this Permit to Install.)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
B010 (Combustion Turbine CT-2) 76.0 mmBtu/hr rated heat input natural gas-fired cogeneration gas turbine driving a 7 MW rated power output electrical generator and a heat recovery steam generator, New Source Performance Standard (NSPS) 40 CFR Part 60, Subpart GG applicable, NEW SOURCE REVIEW (NSR) SYNTHETIC MINOR per PTI 16-02332 using federally enforceable fuel usage limitations to maintain this PSD Source Category No. 24 (fossil fuel boilers, or combination thereof, totaling more than 250 million Btu/hr heat input) project below the 100 TPY major source threshold to avoid PSD review	OAC rule 3745-31-05(A)(3) 40 CFR 60.332 40 CFR 60.333 OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(4) OAC rule 3745-18-06(A) OAC rule 3745-21-08(B) OAC rule 3745-21-07(B) OAC 3745-23-06(B) 40 CFR Part 75 OAC rule 3745-103 OAC rule 3745-31-05(C)

Applicable Emissions Limitations/Control Measures	
	3745-31-05(A)(3).
	Part III, Section A.I.2.b below.
20% opacity as a six-minute average	
0.014 lb PE/mmBtu heat input	Part III, Section A.I.2.c below.
0.13 lb CO/mmBtu heat input	
0.10 lb NOx/mmBtu heat input (25 ppmvd, mathematically adjusted to 15% oxygen as a diluent).	The following annual emissions limits, for B006 through B010 combined, are based upon a rolling, 12-month summation of the monthly emissions, and are restricted by the federally enforceable production limitations of Part III, Section A.II: 87.0 tons/year of CO; 99.0 tons/year of NOx; 9.5 tons/year of PE; and 99.0 tons/year of SO2.
No fuel, except natural gas with a heat content of at least 1000 Btu per standard cubic foot, a sulfur content of less than 0.3 pound per million standard cubic feet (i.e., 0.0007% by weight sulfur), and a nitrogen content of less than 3% by weight, shall be burned in this emissions unit.	
The requirements of OAC rule 3745-31-05 (A)(3) also include compliance with the requirements of OAC rule 3745-31-05(C) and Part III, Section A.II below.	
The emissions control requirements of these rules are less stringent than the emissions control requirements established pursuant to OAC rule	

2. Additional Terms and Conditions

2.a The mass emissions limitations for PE, CO, and NOx regulated per OAC rule 3745-31-05(A)(3) are equal to or greater than the potential to emit for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.

However, if any proposed change(s), such as with fuel grade, quality, and/or heat content, heat input capacity, equipment changeover, etc., or any other change(s), increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 and 3745-21-07(B), respectively, by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.c If the permittee is subject to the requirements of 40 CFR Part 72 and 75 concerning acid rain, the permittee shall ensure that any effected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

II. Operational Restrictions

1. No fuels, other than the gas specified above, shall be burned in this emissions unit.

2. If burned exclusively, with no usage of gas, the maximum annual oil usage for B006 through B008 combined shall not exceed 2.627 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates. B009 and B010 are not permitted to burn oil, as specified in this permit.

3. If burned exclusively, with no usage of gas, the maximum annual oil usage for B008 shall not exceed 0.740 million gallons based upon a rolling, 12-month summation of the monthly oil usage rates.

4. If burned exclusively, with no usage of oil, the maximum annual gas usage for B006 through

B010 combined shall not exceed 1414 million cubic feet based upon a rolling, 12-month summation of the monthly gas usage rates.

5. If oil is substituted for gas in B006 and/or B007, then the annual limit of 1414 million cubic feet of gas shall be reduced by 71.5 cubic feet for each gallon of oil burned.

6. If oil is substituted for gas in B008, then the annual limit of 1414 million cubic feet of gas shall be reduced by 540 cubic feet for each gallon of oil burned.

7. The permittee has existing fuel usage records such that there is no need for first year monthly fuel usage limitations.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor the volume (i.e., the respective gallons of oil or cubic feet of gas), and associated % by weight sulfur, % by weight nitrogen, Btu/gal of oil, and Btu/cubic foot of gas of the fuel(s) burned in the turbine. The frequency of determination of these values shall be as follows:

   a. If the turbine is supplied fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.

   b. If the turbine is supplied fuel without intermediate bulk storage, the values shall be determined and recorded daily. The permittee or fuel vendors may develop custom schedules for determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the administrator before they can be used to comply with this section.

2. The permittee shall maintain monthly records of the following information for B006 through B010 combined:

   a. the monthly amount of oil burned (gallons);
   b. the rolling, 12-month summation of the monthly oil burned (gallons);
   c. the monthly amount of gas burned (cubic feet);
   d. the rolling, 12-month summation of the monthly gas burned (cubic feet);
   e. the monthly emissions (tons) for each of CO, NOx, PE, and SO2; and
   f. the rolling, 12-month summation of the monthly emissions (tons) for each of CO, NOx, PE, and SO2.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports certifying no fuel, except as specified above, was burned in this emissions unit during the preceding calendar quarter.

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly fuel usages, each for oil and gas, as specified in Part III, A.II Operational Restrictions, as well as the corrective actions that were taken to achieve compliance.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month summation of the monthly emissions, each for CO, NOx, PE, and SO2, for B006 through B010 combined, as well as the corrective actions that were taken to achieve compliance.

4. All above reports shall be submitted in accordance with the deadlines and other requirements specified in Part I - General Term and Condition 2 of this permit.

5. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times, if not already done so:

   a. Construction date (no later than 30 days after such date);

   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

   c. Actual start-up date (within 15 days after such date); and

   d. Date of performance testing (if required, at least 30 days prior to testing).

   Reports are to be sent to:

   Ohio Environmental Protection Agency
   DAPC - Permit Management Unit
   P. O. Box 163669
   Columbus, Ohio 43216-3669

   and

   Akron Regional Air Quality Management District (ARAQMD)
   146 S High Street -- Room 904
   Akron, OH 44308

V. Testing Requirements

1. Compliance with the emission limitations of OAC rule 3745-31-05(A)(3) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the following methods, assuming heat contents of 137,000 Btu/gallon of oil & 1000 Btu/cubic foot of gas:

   a. Emission Limitation: 20% opacity as a six-minute average

      Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

   b. Emission Limitation: 0.014 lb PE/mmBtu heat input

      Applicable Compliance Method: The potential to emit is equal to the above emissions limitation, as demonstrated below:

      E = 0.014 lb PE/mmBtu heat input [potential emissions per AP-42, 9/98, Table 3.1-1].

      Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 5.

   c. Emission Limitations: 0.10 lb NOx/mmBtu heat input

      Applicable Compliance Method: The potential to emit is equal to the above emission limitation, as demonstrated below:

      E = 0.10 lb NOx/mmBtu heat input [potential emissions per manufacturer's specifications].

      Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 7E.

   d. Emission Limitation: 0.13 lb CO/mmBtu heat input

      Applicable Compliance Method: The potential to emit is less than the above emission limitation, as demonstrated below:

      E = 0.122 lb CO/mmBtu heat input [potential emissions per manufacturer's specifications];

      Future testing also may be required in accordance with the procedures specified by 40 CFR Part 60, Appendix A, Method 10.

2. Compliance with the fuel sulfur content and nitrogen content restrictions of this permit shall be determined by any qualified person as follows:

a. sulfur content: ASTM D 2880-71 shall be used for liquid fuels, and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for gaseous fuels. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Administrator.

b. nitrogen content: analytical methods and procedures shall be used for the fuel burned that are accurate to within 5% and are approved by the Administrator.

3. Compliance with the annual CO, NOx, PE, and SO2 emission limitations of OAC rule 3745-31-05 (C) in Part III, Section A.I.1 of these terms and conditions shall be demonstrated in accordance with the emissions determination, as required in the record keeping section of Part III, Section A.III.2 above, using the synthetic minor potential to emit strategy contained in the "Permit to Install Application Supporting Documentation" prepared 10/21/03 by David Marczely, Environmental Design Group, 450 Grant Street, Akron, Ohio 44311, included in the application.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

   In addition, for this new emissions unit other air dispersion modeling requirements pursuant to OEPA's Engineering Guide number 69 are exempt because it has been determined that the shut down of existing coal fired boilers and other emissions units at the facility are considered to be an environmentally beneficial project per discussions with Ohio EPA air dispersion modeling staff.

2. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
B010 - Combustion Turbine CT 2	OAC rule 3745-31-05	None (All applicable permit requirements are contained in Part III.A "State and Federally Enforceable Section" of this Permit to Install.)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None